

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

DELAWARE MARKETING	)	
PARTNERS, LLC, a Delaware,	)	
limited liability company,	)	
	)	
Plaintiff,	)	C.A. No.: 04-263 Erie
	)	
v.	)	Judge McLaughlin
	)	Magistrate Judge Baxter
CREDITRON FINANCIAL SERVICES,	)	
INC., a Pennsylvania corporation, and	)	
TELATRON MARKETING GROUP,	)	
INC., a Pennsylvania corporation,	)	
	)	
Defendants.	)	

**PLAINTIFF'S FIRST SET OF INTERROGATORIES AND REQUEST FOR  
PRODUCTION OF DOCUMENTS DIRECTED TO DEFENDANTS**

AND NOW, comes Plaintiff, Delaware Marketing Partners, Inc., and hereby serves the within  
First Set of Interrogatories and Requests for Production of Documents to Defendants, as follows:

**DEFINITIONS**

1. The word "ALC" shall include Academic Learning Center, Creditron Financial Services, Inc., Telatron Marketing Group, Inc., and all agents, employees, officials, officers, executives, directors, and others who directly or indirectly represent in any manner the defendants.
2. The word "loan" means each loan that was funded as a result of any student loan acquisition services which were performed under the Student Loan Origination and Marketing Agreement between the parties.
3. If you are unable to answer the following Interrogatories completely, answer to the extent possible, specifically stating the reason for your inability to answer the remainder and stating whatever information or knowledge you have concerning the unanswered portion.

**INTERROGATORIES**

1. For each loan, state the following:

(a) The loan number, and the name, address, and social security number of the borrower. (If for privacy reasons, you object to providing the entire social security number, you may provide the last 4 digits of the number).

**ANSWER:**

(b) Who prepared the loan application for funding?

**ANSWER:**

(c) The name of the company to whom the loan application was sent for funding, and the date it was sent.

**ANSWER:**

(d) The name of the company which originally serviced the loan.

**ANSWER:**

(e) Identify the company that purchased the application or the loan itself.

**ANSWER:**

(f) Produce the notice that ALC received that the loan was ready to be funded.

**ANSWER:**

(g) Produce the notice that ALC received that the loan had funded.

**ANSWER:**

(h) Produce the records that ALC created to reflect the fact that the loan had

funded.

**ANSWER:**

(i) What was the date that the loan funded?

**ANSWER:**

(j) State the date, the amount, the method of payment (e.g., wire, check, etc.), and the source of each and every payment received by or on behalf of ALC.

**ANSWER:**

(k) State the date, the amount, the method of payment and identify the recipient of all monies disbursed by or on behalf of ALC from the payments identified in the answer to Interrogatory No.1(j).

**ANSWER:**

2. Produce copies of all books, records, writings, and other documents which refer or relate in any way to the payments identified in your answers to Interrogatories Nos. 1 (j) and (k).

**ANSWER:**

3. Produce all documentation that was created by or on behalf of ALC when the loan was sent for funding.

ANSWER:

4. Produce copies of all confirmations received by ALC from any and all servicers that the loan application has been received?

ANSWER:

5. Describe the process of how ALC tracked one-step loans, two-step loans , add-ons and additional disbursements identified in any funding documentation received by ALC.

ANSWER:

6. Provide the complete contracts with any purchaser of the loan applications or loans.

ANSWER:

7. Provide all invoices submitted to the purchasers of loans and loan applications.

ANSWER:

8. Produce the documentation which accompanied payment from each loan purchaser.

ANSWER:

9. Describe your procedures and methodology used to determine the accuracy of the payment from the purchaser for the loan, and produce all documents which refer or relate to these procedures and methodology.

ANSWER:

10. Provide any e-mails, letters or other correspondence from and to ALC from and to any loan and application purchaser regarding loans that have funded, payments owed, payments received, reconciliation of payments, payments made or any modification to the contract or payment schedule.

**ANSWER:**

11. Please provide all notes, presentations and proposals made to and from any meetings with loan and applications purchasers related to loans that have funded, payments owed, payment received, reconciliation of payments, payments made or any modification to the contract or payment schedule or original contract negotiation.

**ANSWER:**

12. Provide the minutes and notes of all meetings where ALC's revenue, finances or payments were discussed as they relate to the loans.

**ANSWER:**

13. State the total amount of gross revenues received by ALC or on its behalf with respect to the loans and produce copies of all records which relate to or reflect this amount or upon which you base the calculation of the amount.

**ANSWER:**

14. Produce a copy of the full and complete Student Loan Origination and Marketing Agreement, with all addenda, revisions, and/or supplements.

**ANSWER:**

15. Produce copies of all correspondence and/or communications from ALC to or from the plaintiff regarding or relating to:

(a) Discussions, proposals, conferences and/or meetings preliminary to the execution of the Student Loan Origination Agreement identified in the Complaint.

**ANSWER:**

(b) All notes of any meetings, discussions, and/or conferences relating to the subject matter of the Student Loan Origination Agreement identified in the Complaint.

**ANSWER:**

(c) Plaintiffs work and/or performance under the Student Loan Origination Agreement identified in the Complaint.

**ANSWER:**

(d) All income projections, business projections, business estimates and/or business estimates prepared by you or anyone else relating to or concerning the business and/or income expected as a result of the Student Loan Origination Agreement identified in the Complaint.

ANSWER:

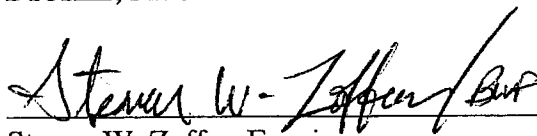
(e) All amounts paid by you to the plaintiff.

ANSWER:

(f) Produce copies of all documents, records, writing, papers, materials and/or things you intend to offer into evidence at the time of the trial at this matter.

ANSWER:

DICKIE, McCAMEY & CHILCOTE

A handwritten signature in black ink, appearing to read "Steven W. Zoffer", is written over a horizontal line.

Steven W. Zoffer, Esquire

P.A. I.D. # 62497

Attorney for Plaintiff, Delaware Marketing  
Partners, LLC

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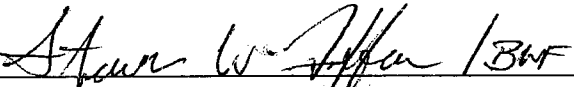
Dated: September 14, 2005

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing **Interrogatories And Requests For Production Of Documents Directed to Defendants** were served via First Class Mail this 14 day of September, 2005 upon counsel for the Defendants addressed as follows:

Craig A. Markham, Esquire  
Joseph T. Messina, Esquire  
Elderkin, Martin, Kelly & Messina  
150 East Eighth Street  
Erie, PA 16501-1819

DICKIE, McCAMEY & CHILCOTE

By:  / BWF  
Steven W. Zoffer, Esquire  
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